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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DIAMOND RESORTS CORPORATION, a
Maryland corporation; DIAMOND RESORTS
HOLDINGS, LLC, a Nevada limited liability
company; and DIAMOND RESORTS
INTERNATIONAL, INC., a Delaware
corporation,

Plaintiffs,

vs.

KYLE BROWN, an individual; MARTIN
BROWN, an individual; EXCHANGE POINTS
CLUB, LLC, a Florida and Missouri limited
liability company; PREMIER REWARDS LLC, a
Missouri limited liability company; VMG
RESORTS LLC, a Missouri limited liability
company; VACATION MANAGEMENT
GROUP, LLC, a Missouri limited liability
company; and OWNER EXTRAS LLC, a
Missouri limited liability company,

Defendants.

Case No.: 2:19-cv-00227-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR
PLAINTIFFS/COUNTER-
DEFENDANTS TO RESPOND TO
COUNTERCLAIMS OF DEFENDANTS/
COUNTERCLAIMANTS**

First Request

EXCHANGE POINTS CLUB, LLC, A Florida
And Missouri Limited Liability Company;
MEMBER PERKS, LLC, Formerly Known As
PREMIER REWARDS, LLC, A Missouri Limited
Liability Company; And VACATION
MANAGEMENT GROUP, LLC, A Missouri
Limited Liability Company,

Counterclaimants,

vs.

DIAMOND RESORTS CORPORATION, a
Maryland corporation; DIAMOND RESORTS
HOLDING, LLC, a Nevada limited liability
company; DIAMOND RESORTS
INTERNATIONAL, INC., a Delaware
corporation; and DIAMOND RESORTS
INTERNATIONAL CLUB, LLC, a Delaware
corporation; and DIAMOND RESORTS
CENTRALIZED SERVICES COMPANY, a
Delaware corporation,

Counter-defendants.

Plaintiffs/Counter-Defendants Diamond Resorts Corporation, Diamond Resorts Holdings,
LLC, Diamond Resorts International, Inc., Diamond Resorts International Club, LLC, and
Diamond Resorts Centralized Services Company (collectively, the “Diamond Entities”), and
Defendants/Counterclaimants Kyle Brown, Martin Brown Exchange Points Club, LLC, Premier
Rewards LLC, VMG Resorts LLC, Vacation Management Group LLC, and Owner Extras LLC
(collectively, “Defendants,” and, together with Diamond, the “Parties”) stipulate and agree to
extend the time for the Diamond Entities to respond to the Defendants’ Counterclaims as follows:

1. Defendants filed their Answer and Counterclaims on August 16, 2019.
2. In their Counterclaims, Defendants named as Counter-Defendants two parties –
Diamond Resorts International Club, LLC, and Diamond Resorts Centralized Services Company –
that had not previously been named in this action.
3. Undersigned counsel for the Diamond Entities agreed to accept service of the
Counterclaims on behalf of Diamond Resorts International Club, LLC and Diamond Resorts
Centralized Services Company as of August 16, 2019 in exchange for the agreement of

Defendants to extend the time for all Diamond Entities to respond to the Counterclaims from September 6, 2019 to September 27, 2019.

4. The Parties stipulate and agree that the Diamond Entities will have up to and until September 27, 2019 to respond to the Counterclaims.

5. The Parties make this request in good faith and not for the purposes of delay.

Dated: August 23, 2019

Dated: August 23, 2019

BALLARD SPAHR LLP

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Abran Vigil

By: /s/ Michael Kanach

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ORDER

IT IS SO ORDERED.



NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE

DATED: August 26, 2019